

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

ABIGIAL RATCHFORD, ALYSSA NOBRIGA
AMANDA CERNY, ARIANNY LOPEZ,
BRENDA GIEGER, BROOKE JOHNSON a/k/a
BROOKE TAYLOR, DENISE TRLICA a/k/a
DENISE MILANI, DESSIE MITCHESON,
DEVIN JUSTINE TAKEGUMA, EMILY
SEARS, JACLYN SWEDBERG, JAIME
EDMONDSON LONGORIA, JESSICA
BURCIAGA, JESSICA HINTON a/k/a JESSA
HINTON, JESSICA GOLDEN a/k/a JESSE
GOLDEN, JOANNA KRUPA, KEELEY
HAZELL, KRISTAL FORSCUTT HIPWELL,
LINA POSADA, LUCY PINDER, MARIANA
DAVALOS, NIKKI LEIGH, PAOLA CANAS,
RHIAN SUGDEN, SHELBY CHESNES,
TIFFANY TOTH GRAY, TIFFANY SELBY
and URSULA MAYES,

Plaintiffs,

vs.

R.I. CRANSTON ENTERTAINMENT INC.
d/b/a WONDERLAND and STEVEN
MEDEIROS,

Defendants.

Plaintiffs ABIGIAL RATCHFORD, ALYSSA NOBRIGA, AMANDA CERNY,
ARIANNY LOPEZ, BRENDA GIEGER, BROOKE JOHNSON a/k/a BROOKE TAYLOR,
DENISE TRLICA a/k/a DENISE MILANI, DESSIE MITCHESON, DEVIN JUSTINE
TAKEGUMA, EMILY SEARS, JACLYN SWEDBERG, JAIME EDMONDSON LONGORIA,
JESSICA BURCIAGA, JESSICA HINTON a/k/a JESSA HINTON, JESSICA GOLDEN a/k/a
JESSE GOLDEN, JOANNA KRUPA, KEELEY HAZELL, KRISTAL FORSCUTT
HIPWELL, LINA POSADA, LUCY PINDER, MARIANA DAVALOS, NIKKI LEIGH,
PAOLA CANAS, RHIAN SUGDEN, SHELBY CHESNES, TIFFANY TOTH GRAY,

Civil Action No.: 19-cv-

**COMPLAINT AND DEMAND FOR
JURY TRIAL**

TIFFANY SELBY and URSULA MAYES, (collectively, “Plaintiffs”), by and through their undersigned counsel, as and for their Complaint (“Complaint”) against defendants R.I. CRANSTON ENTERTAINMENT INC. d/b/a WONDERLAND (collectively “Defendants”) and STEVEN MEDEIROS respectfully allege as follows:

BACKGROUND

1. This is an action for damages and injunctive relief relating to Defendants’ misappropriation, alteration, and unauthorized publication and use in advertising of images of Plaintiffs, each of whom are well-known professional models, to promote their strip club, Wonderland located in 257 Allens Avenue, Providence, Rhode Island 02905 (“Wonderland” or the “Club”).

2. As detailed below, Defendants’ misappropriation and unauthorized use of Plaintiffs’ images, photos and likenesses (collectively, “Images”) constitutes: a) violation of section 43 of the Lanham Act, 28 U.S.C. § 1125(a)(1), which prohibits both false or misleading representations of fact in commercial advertising and the false or misleading use of a person’s image for commercial purposes; b) violation of each Plaintiff’s common law right of privacy as pertains to Defendants’ appropriation of their likeness; c) violation of Rhode Island Gen. Law 1956, § 9-1-28 *et seq.* based on Defendants’ willful and unauthorized use of each Plaintiff’s image for advertising purposes; e) defamation; and f) various common law torts, including conversion.

3. In addition to the actual, punitive and exemplary damages set forth below, Plaintiffs likewise seek an Order from this Court permanently enjoining Defendants from using their Images to promote any Club, via any medium.

JURISDICTION & VENUE

4. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 because Plaintiffs have stated claims under, *inter alia*, the Lanham Act, 28 U.S.C. § 1125(a)(1), and jurisdiction over the state law claims pursuant to 28 U.S.C. § 1337.

5. As set forth immediately below, Plaintiffs are, and at all times relevant to this action have been, professional models who reside throughout the United States.

6. According to publicly available records, defendant R.I. Cranston Entertainment Inc. is a corporation formed under the laws of the state of Rhode Island, with its principal place of business located at 257 Allens Avenue, Providence, Rhode Island 02905 . R.I. Cranston Entertainment Inc. operates Wonderland, which is located at 257 Allens Avenue, Providence, Rhode Island 02905 .

7. Venue is proper in the United States District Court for the Western District of Rhode Island because Providence, Rhode Island is Defendants' principal place of business.

8. A significant portion of the alleged causes of action arose and accrued in Providence, Rhode Island and the center of gravity for a significant portion of all relevant events alleged in this complaint is predominately located in Providence, Rhode Island.

PARTIES

Plaintiffs

9. Plaintiff Abigail Ratchford ("Ratchford") is a well-known professional model, and a resident of Los Angeles County, California.

10. Plaintiff Alyssa Nobriga ("Nobriga") is a well-known professional model, and a resident of Los Angeles County, California.

11. Plaintiff Amanda Cerny ("Cerny") is a well-known professional model, and a

resident of Los Angeles County, California.

12. Plaintiff Arianny Lopez (“Lopez”) is a well-known professional model, and a resident of Los Angeles County, California.

13. Plaintiff Brenda Geiger (“Geiger”) is a well-known professional model, and a resident of Onondaga County, New York.

14. Plaintiff Brooke Johnson a/k/a Brooke Taylor (“Taylor”) is a well-known professional model, and a resident of Santa Barbara County, California.

15. Plaintiff Denise Trlica a/k/a Denise Milani (“Milani”) is a well-known professional model, and a resident of Los Angeles County, California.

16. Plaintiff Dessie Mitchenson (“Mitchenson”) is a well-known professional model, and a resident of Orange County, California.

17. Plaintiff Devin Justine Takeguma (“Takeguma”) is a well-known professional model, and a resident of Ventura County, California.

18. Plaintiff Emily Sears (“Sears”) is a well-known professional model, and a resident of Los Angeles County, California.

19. Plaintiff Jaclyn Swedberg (“Swedberg”) is a well-known professional model, and a resident of San Bernardino County, California.

20. Plaintiff Jaime Edmondson-Longoria (“Longoria”) is a well-known professional model, and a resident of Maricopa County, Arizona.

21. Plaintiff Jessica Burciaga (“Burciaga”) is a well-known professional model, and a resident of Fulton County, Georgia.

22. Plaintiff Jessica Hinton a/k/a Jessa Hinton (“Hinton”) is a well-known professional model, and a resident of Los Angeles County, California.

23. Plaintiff Jessica Golden a/k/a Jesse Golden (“Golden”) is a well-known professional model, and a resident of Los Angeles County, California.

24. Plaintiff Joanna Krupa (“Krupa”) is a well-known professional model, and a resident of Miami-Dade County, Florida.

25. Plaintiff Keeley Hazell (“Hazell”) is a well-known professional model, and a resident of Los Angeles County, California.

26. Plaintiff Krystal Forscutt Hipwell (“Hipwell”) is a well-known professional model, and a resident of Caringbah, Australia.

27. Plaintiff Lina Posada (“Posada”) is a well-known professional model, and a resident of San Bernardino County, California.

28. Plaintiff Lucy Pinder (“Pinder”) is a well-known professional model, and a resident of Winchester, England.

29. Plaintiff Mariana Davalos (“Davalos”) is a well-known professional model, and a resident of Los Angeles County, California.

30. Plaintiff Nikki Leigh (“Leigh”) is a well-known professional model, and a resident of Los Angeles County, California.

31. Plaintiff Paola Canas (“Canas”) is a well-known professional model, and a resident of Miami-Dade County, Florida.

32. Plaintiff Rhian Sugden (“Sugden”) is a well-known professional model, and a resident of Los Angeles County, California.

33. Plaintiff Shelby Chesnes (“Chesnes”) is a well-known professional model, and a resident of Prestwich, England.

34. Plaintiff Tiffany Toth Gray (“Gray”) is a well-known professional model, and a

resident of Orange County, California.

35. Plaintiff Tiffany Selby (“Selby”) is a well-known professional model, and a resident of Duval County, Florida.

36. Plaintiff Ursula Sanchez a/k/a Ursula Mayes (“Mayes”) is a well-known professional model, and a resident of Orange County, California.

Defendants

37. According to publicly available records, defendant R.I. CRANSTON ENTERTAINMENT INC. is formed under the laws of the state of Rhode Island. During times relevant to this action, R.I. CRANSTON ENTERTAINMENT INC. operated Wonderland in Providence, Rhode Island.

38. According to publicly available records, and upon information and belief, STEVEN MEDEIROS, in his capacity as principal, owner and/or CEO of R.I. CRANSTON ENTERTAINMENT INC. maintained operational control over Wonderland, including all advertising relating thereto.

FACTUAL ALLEGATIONS

39. As set forth immediately below, each Plaintiff is a well-known professional model who earns her livelihood modeling and licensing her Images to companies, magazines and individuals for the purpose of advertising products and services.

40. Plaintiffs’ careers in the modeling industry place a high degree of value on their good will and reputation, which is critical in order to maximize their earning potential, book modeling contracts, and establish each of their individual brands. In furtherance of establishing, and maintaining, their brands, Plaintiffs are necessarily selective concerning the companies, and brands, for which they model.

41. Each of the Plaintiffs' Images was misappropriated, and intentionally altered, by one or more of the Defendants in order to make it appear that they worked at, endorsed or were otherwise associated or affiliated with Wonderland.

42. In the case of every Plaintiff, such appearance was false.

43. Moreover, in every case this misappropriation occurred without any Plaintiff's knowledge, consent or authorization, at no point did any Plaintiff ever receive any remuneration for Defendants' improper and illegal use of their Images, and Defendants' improper and illegal use of Plaintiffs' Images have caused each Plaintiff to suffer substantial damages.

44. Further, in certain cases Defendants misappropriated Plaintiffs' advertising ideas because the Images they misappropriated came from Plaintiffs' own social media pages, which each Plaintiff uses to market herself to potential clients, grow her fan base, and build and maintain her brand.

Plaintiffs' Backgrounds and Careers

45. Abigail Ratchford born in Pennsylvania, is an American model and aspiring actress known for taking the Internet by storm in 2013. Abigail's deft use of social media, combined with the provocative pictures showcasing the brunette's 36DD-24-36 frame, proved a winning combination. This formula helped land her on numerous men's websites, a six-page print spread in a popular Australian men's magazine, and also led to her being selected to audition for parts in Maxim, a feature film, and television shows found on ABC and E! Networks. She has over 9.1 million followers on Instagram, over 4.2 million followers of Facebook, and over 807 thousand followers on Twitter.

46. That we know of, Ratchford is depicted in the photos in Exhibit "A" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Ratchford was either a stripper working at Wonderland, that she endorsed the Club, or that she

was otherwise associated or affiliated with the Club.

47. Ratchford has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

48. Alyssa Nobriga is trained as a psychotherapist and works as a professional coach with individuals and corporations, both nationally and internationally. She obtained her masters degree in Clinical Psychology, specializing in Mind-Body Psychotherapy from The Chicago School of Professional Psychology. Alyssa is currently on faculty at the University of Santa Monica where she holds a second masters degree in Spiritual Psychology, with an emphasis on Consciousness, Health and Healing. She is a graduate of The School for The Work, has extensive training in Imago Couples Therapy as well as an advanced certification from the Hakomi Institute in mindfulness-based therapeutic practices and is certified as a success coach. Alyssa is a spiritual advisor for CEOs and senior executives, she facilitates transformational group intensives and women's leadership and empowerment workshops. She also leads wellness retreats around the world centered on mindfulness and conscious living as well as 6-month mastermind intensives supporting women in standing forward as leaders and soul-centered professional coaches. She is a contributor to various publications such as The Huffington Post, Positively Positive and The Daily Love and is a featured expert on Deepak Chopra's YouTube channel. Alyssa's enthusiasm for this work has led her to develop a unique way of blending multiple modalities and life experiences to support people in a soulful and practical way. Her intention and vocation is to assist others in leading more open, authentic, loving, and fulfilling lives.

49. That we know of, Nobriga is depicted in the photo in Exhibit “B” to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Nobriga was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

50. Nobriga has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants’ unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

51. Amanda Cerny is a fitness professional, television personality, blogger, and model. She was former Playboy Playmate of the Month (October, 2011), as well as a cover model for Health & Wellness Magazine. She loves to blog about the importance of eating healthy, and working out. She is also chairwoman and Founder of Play Foundation, which is a global foundation founded for the purpose of bringing the youth closer to their love of music. Ms. Cerny is very well known throughout the social media world with 4.1 million Vine followers, 2.8 million Instagram followers, 232 thousand YouTube subscribers, 2.3 million Facebook fans, over 360 thousand followers on Snapchat, and 341 thousand Twitter followers.

52. That we know of, Cerny is depicted in the photos in Exhibit “C” to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Cerny was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

53. Cerny has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants’ unauthorized use of her Image, and has suffered, and will continue

to suffer, damages as a result of same.

54. Arianny Celeste Lopez is an American model, businesswoman and celebrity. Ms. Celeste is recognized as one of the most consistent and most popular personalities of the UFC where she has worked as an Octagon Girl since 2006. Ms. Celeste is the Co-Host of the popular Velocity TV show, Overhaulin'. She is adored around the world for her exotic beauty and great relationship with her fans. Ms. Celeste booked her first modeling job when she was just four months old. Growing up as a very athletic and hardworking young woman, she excelled in cheer, dance and gymnastics before attending the University of Nevada Las Vegas (UNLV) to pursue a degree in Fitness Management and Nutrition. Fluent in Spanish, Ms. Celeste has quickly become one of the most sought-after talents in the modeling world and has appeared on the covers of some of the world's most foremost magazines including, Playboy, Maxim US, FHM, Maxim Korea, Maxim Philippines, FHM Australia and UFC Magazine. In addition to modeling, Ms. Celeste has hosted television shows, appeared in short films and recorded some original music. Ms. Celeste is in an elite class of Social Media influencers with over 3.2 million Instagram followers, over 703 thousand Twitter followers and an incredible 6 million fans on Facebook combined with her own personal website.

55. That we know of, Lopez is depicted in the photo in Exhibit "D" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Lopez was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

56. Lopez has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue

to suffer, damages as a result of same.

57. Brenda Geiger is a hip-hop/eye candy model and actress who appeared with 8-time Grammy nominee rapper Lil Wayne in singer Keri Hilton's music video "Ms. Officer". Ms. Geiger, known as the Jersey Gem, is perhaps best known for her work for Glamour and an appearance on The Howard Stern Show in a Miss HTV March contest. Ms. Geiger has been featured in numerous men's magazines such as Show, Maxim and Raw. Ms. Geiger has been featured on numerous product campaigns, such as Primitive Clothing, where she has her own custom skateboard decks which originally sold out but are now back in production.

58. That we know of, Geiger is depicted in the photo in Exhibit "E" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Geiger was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

59. Geiger has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

60. Brooke Johnson a/k/a Brooke Taylor is a world-renowned model who has appeared in magazines such as FHM, Maxim, Viva Glam, and Stuff. She has also appeared in commercials and billboards such as Fredrick's of Hollywood, Coors Light, and Budweiser. In addition, Ms. Johnson has also been featured in countless other catalogs, billboards, television commercials and shows.

61. That we know of, Taylor is depicted in the photos in Exhibit "F" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that

Taylor was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

62. Taylor has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

63. Denise Trlica a/k/a Denise Milani is the world's most famous pinup model, who is frequently names one of the most searched women on the internet. At one point, her self-titled website was the most popular model website in the world. Milani also became the winner of Miss Bikini World 2007. At 21, Milani was given an opportunity to model for SPORTSbyBROOKS as a sports model and posed for such publications as PinupFiles.com. In 2009, Milani was selected as the 99th most desired women in the world by Askmen Magazine. In 2011, she was ranked in the 5th position in championship NPC Excalibur Bikini held in Culver City, California. Similarly, in the year 2013, she was one of ten (10) most desirable women in the world. Milani's social media reach has hit almost 648 thousand followers on Instagram, 6.3 million Facebook likes, and over 126 thousand followers on Twitter.

64. That we know of, Milani is depicted in the photos in Exhibit "G" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Milani was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

65. Milani has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue

to suffer, damages as a result of same.

66. Dessie Mitcheson competed for Miss Pennsylvania USA at age 18 and placed in the top ten. Ms. Mitcheson soon became the Face of Playboy intimates, and the following year she became the Face of MGM Grand Las Vegas and Miss Pennsylvania Intercontinental. Ms. Mitcheson was also named Maxim magazine's Hometown Hottie, in which thousands of girls across the United States enter the yearly contest. That same year, Ms. Mitcheson was #100 on Maxim's Hot 100 list. She has graced the pages of multiple issues of Maxim, including a three page spread, two center folds, and landed the cover for the May 2014 Navy issue. Ms. Mitcheson's career as a TV personality, actress, and spokeswoman is booming. Ms. Mitcheson was recently featured as the main Tecate Beer ring girl in the biggest Pay-per-View event in history, the Mayweather v Pacquiao fight, which gave her worldwide visibility with over 100 million viewers. This triggered a huge demand for her services and increased her daily quote substantially. Ms. Mitcheson has been featured by national advertisers such as Crest toothpaste, Tecate, Roma Costumes and J. Valentine. Ms. Mitcheson was the face of an International video game.

67. That we know of, Mitcheson is depicted in the photo in Exhibit "H" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Mitcheson was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

68. Mitcheson has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

69. Devin Justine Takeguma is a single mom, trying to be independent and setting a good example for her daughter. Devin works as a bartender and Hooters girl, and in her free time she likes to draw and paint, listen to new music, and spend time at the beach with her kids. She has some experience as a model, modeling in Los Angeles, California since 2008. She has worked for various surf, lingerie, swimsuit, athletic apparel and clothing companies such as Salty Beards, Swell, Pegasus, Classy Sachet, Frankie's Bikinis, Goddess Knits, Posh Pua, Luna Jai, Kate and Lace and many others.

70. That we know of, Takeguma is depicted in the photo in Exhibit "I" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Takeguma was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

71. Takeguma has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

72. Emily Sears is, and at all times relevant to this action is an Australian model, spokeswoman and social media phenom. As a social media influencer, she encourages conversation via the content she creates. Emily shares body positive images with millions of followers and supports others to have the confidence to seek out healthy relationships. Through her efforts, she's witnessed a ripple effect of kindness and self- acceptance in her interactions with others. Ms. Sears believes social media empowers women to represent themselves how they want, as opposed to what industries may demand. These avenues have proven that every body type is beautiful. As a curvy model, Emily has been able to redirect her career with the power of

social. People now control what is popular in the world, and she's humbled to have the opportunity to influence others to direct their own paths. Ms. Sears has appeared in titles such as: GQ USA, FHM, MAXIM, Kandy Magazine, Ralph, M, Transworld, Motocross, Esquire and ZOO Weekly. Ms. Sears represented world-wide brands such as, Ciroc, Naven, Strike force MMA, Kumo Tires, Comfort Revolution, Two in the shirt, Monster Energy and Man eater Swimwear. Emily has also appeared in a variety of TVC and music video roles including national campaigns and internationally renowned music artists worldwide. Ms. Sears has her own commercial website <http://www.emilysears.com/index.php> Ms. Sears has a combined tally of over 5 million Social Media Followers.

73. That we know of, Sears is depicted in the photo in Exhibit "J" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Sears was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

74. Sears has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

75. Jaclyn Swedberg is an American actress and model. Ms. Swedberg has appeared in a number of TV series including, Badass, Playboy's Beach House, Pauly Shore's Paulytic's, Snake and Mongoose and a new series about to air called Muck in which she has a starring recurring role. Ms. Swedberg was Playboy's Playmate of the month April 2011 and went on to win Playmate of the Year 2012/ 2013.

76. That we know of, Swedberg is depicted in the photos in Exhibit "K" to promote

Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Swedberg was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

77. Swedberg has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

78. Jaime Edmondson-Longoria comes from a family of police officers. Ms. Edmondson-Longoria graduated from Florida Atlantic University with a degree in Criminal Justice in 2002. She worked the night shift as a police officer in Boca Raton, Florida for two years until quitting the police force to become a cheerleader for the Miami Dolphins. Ms. Edmondson-Longoria and fellow Miami Dolphins cheerleader Cara Rosenthal were participants in the competitive reality TV series "The Amazing Race 14." Ms. Edmondson-Longoria was the Playmate of the Month in the January 2010 issue of "Playboy." She has been a sports blogger for Playboy online and co-host of Sirius Fantasy Sports Radio. She appeared on "The Bunny House" documentary, in the Trace Adkins video for "This Aint No Love Song" and numerous other television, print, radio and online outlets. Ms. Edmondson-Longoria and her husband, MLB Superstar Evan Longoria MLB superstar, have 2 children

79. That we know of, Longoria is depicted in the photos in Exhibit "L" to promote Wonderland on its Facebook, Instagram and Twitter pages. This Image was intentionally altered to make it appear that Longoria was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

80. Longoria has never been employed at Wonderland, has never been hired to

endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

81. Jessica Burciaga is a model and a business owner from Orange County, CA. She is of Mexican, French, and Irish descent. Ms. Burciaga began modeling in 2005 when she submitted a few photos to Stuff Magazine. The magazine responded by flying her out to New York for a photo shoot. After Ms. Burciaga's first photo shoot, she won Stuff Magazine's "Neighborhood Knockout" contest. The prize was \$5,000, a 4-page spread in the magazine, and an appearance as a ring girl in EA Sports Fight Night Round 3 video game. Ms. Burciaga's popularity rose quickly and she began appearing in various magazines including Playboy, Maxim, Import Tuner, Modified Mag, Performance Auto & Sound, Show Latina, Lowrider Magazine, and many others. Ms. Burciaga was the Playboy Playmate of the Month for February 2009 and has appeared as herself in several episodes of the reality TV series The Girls Next Door. Recently she has been focusing on various business ventures including a women's online clothing boutique, www.SailorandSaint.com. Ms. Burciaga's social media reach has surpassed 1.6 million followers on Instagram, 44.6 thousand Facebook likes, and 192 thousand followers on Twitter.

82. That we know of, Burciaga is depicted in the photos in Exhibit "M" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Burciaga was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

83. Burciaga has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has

received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

84. Jessica Hinton a/k/a Jessa Hinton was first introduced to the modeling industry at age fourteen when she was discovered by a talent manager at a wedding. She immediately booked three national TV commercials and guest appeared on Baywatch and 7th Heaven by the age of sixteen. At the age of eighteen, she began working runway shows and doing print campaigns. In 2010, Ms. Hinton became the face of the Palms Hotel & Casino's 2010 ad campaign. She then expanded to TV personality roles having hosted for Victory Poker, and as an interview personality for the Top Rank Boxing interviewing the likes of Manny Pacquiao and Shane Mosley. In 2011, she was selected as July's Playmate of the Month becoming one of the most popular Playmates of that year. She was the center piece of an ad campaign for Milwaukee's Best Beer in conjunction with Playboy Enterprises. Ms. Hinton also gained spokes model roles for Affliction Clothing, Enzo, Milano Hair Products, REVIV Wellness Spa, Protein World and ongoing modeling contracts with Rhonda Shear Shapewear, Leg Avenue and Roma Costume, in addition to hosting a Los Angeles, CA television station KTLA. Her images appeared on billboards, magazines, posters, and multiple forms of electronic media. Ms. Hinton has been a featured front cover model gaining attraction for magazines such as FHM, Kandy, MMA Sports, Guitar World, and Muscle & Fitness. She was recently named Creative Director for MAJR Media and was given part ownership for her role with the company. Ms. Hinton has also earned an elite status as a social media celebrity crossing well over the 1.2 million follower benchmark on Instagram, over 2.8 million followers on Facebook, and over 247 thousand followers on Twitter.

85. That we know of, Hinton is depicted in the photos in Exhibit "N" to promote

Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Hinton was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

86. Hinton has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

87. Jessica Golden a/k/a Jesse Golden is a successful model and businesswoman. She became a supermodel with high profile clients that included Abercrombie & Fitch, Victoria Secret, Lucy Sport, Coca-Cola, GAP, and Nike. She has graced the covers of magazines like New York Times, Fitness, New Port Beach, Yoga International, and many others. Jesse shares her secrets on her own blog and also writes for many other magazines and sites. She's currently becoming a Holistic Health Practitioner and is a certified Hatha yoga teacher. She has her own fitness and yoga brand and products. Working for many notable fashion brands, dozens of commercials, television and film; Jesse continues to expand her career through life experiences.

88. That we know of, Golden is depicted in the photo in Exhibit "O" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Golden was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

89. Golden has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

90. Joanna Krupa is a model, actress, and dancer. She has appeared on magazine covers including Personal, Steppin' Out, Envy, Shape, FHM, Stuff, Inside Sport, Teeze, and Maxim. Ms. Krupa was named the “Sexiest Swimsuit Model in the World” and Maxim ranked her #55 in its “2011 Hot 100”. In 2004-2005, she was voted German’s Maxim Model of the year. Ms. Krupa also models for ads with PETA and has appeared twice on the Playboy magazine cover. In addition, Ms. Krupa has appeared in the action film “Max Havoc: Curse of the Dragon,” as well as the television show “Superstars” in June of 2009 and on Season 9 of “Dancing with the Stars.” She is currently the head judge of Poland’s “Next Top Model” since fall of 2010, and is a cast member for the reality TV show “The Real Housewives of Miami.”

91. That we know of, Krupa is depicted in the photo in Exhibit “P” to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Krupa was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

92. Krupa has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants’ unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

93. Keeley Hazell is an English model, musician, singer and actress. Hazell became one of Britain's most successful glamour models, working with brands such as Page 3, FHM, Loaded, Nuts and Zoo Weekly. She has also made numerous television appearances and has, more recently, focused on her acting career, appearing in films such as Horrible Bosses 2 (2014). Hazell was born on 18 September 1986 in Lewisham, London, England, and grew up in Grove Park. She attended the Ravensbourne School in Bromley. Her mother, Amber, was a dinner lady,

and her father, Roy, was a window fitter; they separated when Hazell was 13 years old. At 16 years of age, Hazell left school to work as a hairdresser. Her colleagues persuaded her to try her luck at modelling. At 17, she competed in The Daily Star's "Search for a Beach Babe" contest and won. Still not old enough to pose on Page 3, she went to study fashion at Lewisham College. Later, a friend told her about The Sun's Page 3 Idol competition. Despite some initial uncertainty about entering the contest, she submitted some photos. She was eventually chosen the winner in December 2004. She won £10,000 worth of "sexy clothes" and "a one-year membership of the Rex cinema and bar". Another part of Hazell's Page 3 Idol win was a one-year exclusive glamour modelling contract with The Sun. Hazell has been regularly featured in Nuts and Zoo. She has been on the cover of The Sun's 2006 and 2007 Page 3 calendars, in addition to her own wall calendars; the 2007 edition selling 30,000 copies in its first few days of release. In June 2005, Hazell appeared on the front cover of Maxim magazine, and she also appeared on the front cover of FHM in September 2005. In January 2006, she appeared on the front cover of Loaded magazine. In 2008, Hazell and agent Ginny Mettrick co-founded a modelling agency called Muse Management. In 2009, according to the August edition of Loaded, Peta Todd stated that Hazell had given modelling up to pursue a career in acting and that she was in America receiving acting lessons. Her last appearance on Page 3 of The Sun was on 30 September 2009. In January 2013, Hazell made another return to modelling by appearing in FHM. Hazell was the face of Sony Computer Entertainment Europe's Formula One 06 video game for PlayStation 2, PlayStation Portable, and F1 CE for PlayStation 3. She is currently the face of MotorStorm: Pacific Rift for PlayStation 3. Hazell had a small role in the full-length version of Cashback, playing "Frozen Girl in Sainsbury's". She was in talks with producers to be in a movie based on the television series Baywatch. In 2007, Hazell and IT expert Gary Schwartz co-presented Byte

Me TV, an online programme that tried to explain technology in an easy to-understand way. In 2008, Hazell appeared in the BBC Three documentary Page Three Teens. Hazell released a pop music single called "Voyeur" in 2008. In 2010, Hazell had her first lead role in the short film Venus and the Sun, a comedic retelling of Ovid's myth, Venus and Adonis. Hazell had a small role in the film Like Crazy, which won both the Grand and a Special Jury Prize at the 2011 Sundance Film Festival. In 2012, Hazell played a supporting role in the British gangster movie St George's Day,[3] which was directed by Frank Harper. In 2015, Hazell landed a role in E!'s first scripted drama, The Royals, as "Violet". She auditioned twice for the role of Anastasia in the film Fifty Shades of Grey. Hazell starred in the 2013 comedy film Awful Nice and the 2015 horror film Whispers. She also appeared in the 2016 short film Queen of Hearts. She appeared in the 2018 TV Movie Vows of Deceit. Hazell was hailed by Conservative leader David Cameron in December 2006 as an "environmental hero" for her campaigns in The Sun, giving environmental tips such as turning lights off during the day. She was named alongside the likes of David Attenborough, Prince Charles, and Arnold Schwarzenegger in the Tories' list. Hazell backed a major breast cancer awareness campaign for Breakthrough Breast Cancer. The campaign, called TALK TLC, aimed to promote Breakthrough's breast health message about the need to be aware of the signs and symptoms of breast cancer. Hazell has also signed up to take part in the Breakthrough Generations Study consisting of 100,000 women and spanning 40 years; the study aims to be the largest and most comprehensive of its kind. Hazell has also appeared naked in advertising posters for PETA, and she has been quoted as saying: "I believe that killing animals for vanity is wrong" and "Once you learn how the fur trade treats animals, it's impossible to think of wearing fur as sexy or glamorous."

94. That we know of, Hazell is depicted in the photos in Exhibit "Q" to promote

Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Hazell was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

95. Hazell has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

96. Krystal Forscutt Hipwell is an Australian model and reality TV contestant and personality. Ms. Hipwell has appeared on over 20 Men's magazine covers such as Zoo Weekly, FHM, and Ralph as well as the video game Need for Speed: ProStreet. Ms. Hipwell also starred in Australian Big Brother series and then another Australian reality show, It Takes Two. Ms. Hipwell then became a regular guest on Bigpond Game Arena Benny and Ritchie show, and also the long running series Packed to the Rafters. Ms Hipwell is married to Neil Hipwell and together they have an extremely successful building and renovations company Future Flip

97. That we know of, Hipwell is depicted in the photo in Exhibit "R" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Hipwell was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

98. Hipwell has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

99. Lina Posada is a fashion model and designer from Barranquilla, Colombia. She is

best known for her appearances in the Besame and Espiral lingerie collection photo-shoots. Ms. Posada has also modeled for Paradizia Swimwear, Babalú Swimwear, Irgus Swimwear, Ujeans, as well as many others. She has well over 500 thousand YouTube views, over 5.6 thousand Twitter followers, 8.8 thousand Facebook followers, and over 93.3 thousand Instagram followers.

100. That we know of, Posada is depicted in the photos in Exhibit "S" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Posada was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

101. Posada has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

102. Lucy Pinder is, and at all times relevant to this action, an English model, actress, host, businesswoman and one of Great Britain's most famous glamour models. Ms. Pinder has featured in publications such as FHM, Nuts, Loaded and the Daily Star, and hundreds of others. Ms. Pinder has appeared on FHM's list of the "100 Sexiest Women in the World" in 2005, 2006 and 2007. Ms. Pinder was a guest columnist in Nuts, entitled "The Truth About Women" and appeared on the final edition of Nuts magazine cover. Ms. Pinder has collaborated with major brands such as Unilever (Lynx) and Camelot (National Lottery) and others, and on large national and international advertising campaigns. Ms. Pinder has an established and developing acting career with many TV appearances and Film credits. Ms. Pinder has appeared on shows such as I'm Famous and Frightened, Soccer AM, Weakest Link, Nuts Tv (host) MTV's TMF (presenter),

Hotel Babylon, and Team and Bo! in the USA. Ms. Pinder was also a contestant on Celebrity Big Brother. Ms. Pinder had starring roles in films such as The Seventeenth Kind, Age of Kill, and Warrior Savitri. Ms. Pinder works closely with a number of Wildlife charities and is involved in fundraising for ‘Tiger Time, The David Shepherd Wildlife Foundation and International Animal Rescue”. Ms. Pinder has also worked with Help for Heroes appearing in the Hots Shots fund raising calendar and supported Male Cancer Awareness Campaign taking part in their MCAC London Strut awareness initiative. She also visited troops in Afghanistan in 2007. Ms. Pinder's own annual calendar continues to be one of the bestselling model calendars year after year and enhances Ms. Pinder's status as an elite class of Social Media Influencers with a combined total of over 2 million followers on Facebook, Instagram and Twitter.

103. That we know of, Pinder is depicted in the photos in Exhibit “T” to promote Wonderland on its Instagram and Twitter pages. This Image was intentionally altered to make it appear that Pinder was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

104. Pinder has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants’ unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

105. Mariana Davalos was born in the US but grew up in Colombia. Ms. Davalos has a twin sister Camilla and together started a modeling career at age 10. By the time Ms. Davalos was 18 her career was already established in Colombia as one of the most famous and successful models in all of Latin America. Ms. Davalos was the face of Nacar cosmetics and has appeared in Maxim magazine, Imagen magazine, Besame, SOHO TV, Rumbas de la Ciudad, La Granja

Tolima, Kiss Catalogue, Deluxe Jeans, Revista Soho, SCRIBE, Coed People, La Gemela mas Dulce, Para Hombre, Spiritual Jeans and Satori. Ms. Davalos is constantly listed in “The top sexiest people in the World” lists and whether solo or teamed up with her twin sister are constantly in demand. Ms. Davlos’ worldwide identity has continued to grow and her earning capabilities have increased dramatically with her Instagram followers of over 493 thousand and over a quarter of a million Facebook fans.

106. That we know of, Davalos is depicted in the photos in Exhibit “U” to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Davalos was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

107. Davalos has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants’ unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

108. Nikki Leigh is currently in preproduction to star in two feature films. Her most recent film, SILENCER, is currently on Amazon, iTunes, VUDU, On Demand, RedBox, and Netflix. After retirement, ex-hitman Frank seeks a normal life. However, Frank cannot escape his old life when his stepdaughter is kidnapped by his former employer. With the situation being so personal, Frank brings back his hitman skills to fight his old boss. SILENCER is an action film, and Nikki is the only woman in a very strong, male dominated cast: (Johnny Mesner, Danny Trejo, Robert LeSardo, Tito Ortiz, Chuck Liddell). She can also be seen as a lead in Blackpills’ “A Girl Is A Gun” digital native series opposite Denise Richards. “A Girl Is A Gun” follows three women living in Los Angeles who go missing, creating wave of panic in the city. While the

police suspect a serial killer is behind the disappearance, the three women have actually joined a secret guerrilla camp where they train to avenge the injustice of a misogynistic system that humiliates and exploits women. Leigh plays Santa Fe, one of the three lead women. The series is available for FREE through Blackpills' new streaming service. Nikki also starred as Jessica in the Turkish comedy "Ay Lav Yu Tuu" with Steve Guttenberg. The film follows a couple, Ibrahim and Jessica, who learn that Ibrahim's village in Turkey is struggling. They head back to Turkey to help out and introduce the townspeople to the modern ways of the western world. The film, which has been described as a mix between "Borat" and "My Big Fat Greek Wedding", was released in September 2017. Leigh recently starred in Lifetime's "Open Marriage" as Becca. To save their struggling marriage, Becca and her husband reluctantly agree to an open relationship with their friends, Mindy and Max. Though their passion is rekindled, they don't expect the jealousy, heartbreak and betrayal that soon follows. The film premiered on Lifetime on January 14, 2017 and is still airing on the network. Leigh's additional credits include CBS's "Two And A Half Men", CBS's "NCIS", "The Bold And The Beautiful", "The Wedding Ringer", "The Bet" and "The Vigilante Diaries". Leigh, originally from Orange County, California, moved to Los Angeles after she landed her own show on Sirius XM. An honors student throughout school, Leigh graduated Cum Laude from California State University of Fullerton. Education is very important to her. She loves working with children to increase their confidence! Her passions also include traveling, sports and animals.

109. That we know of, Leigh is depicted in the photo in Exhibit "V" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Leigh was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

110. Leigh has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

111. Paola Canas is a Colombian born model now residing and working in the United States. Ms. Canas has been in the industry for over twelve years and has found great success as a model, host, runway model, and actor. Ms. Canas has worked runway shows in her native Colombia, as well as Mexico, Ecuador, United States, and most recently in Paris, France. She heads up the international campaign and was a contracted model for Curve and their worldwide lingerie line. In Dubai, United Arab Emirates, Ms. Canas was chosen as the face of the Masters Gold Tournament, and was the image for the "International Surf and Sport Expo" in Orlando, FL. She has worked for international brands and labels such as SOHO, KISS underwear, Salon International, Zona Rosa, and Esteban Escobar. She has appeared in numerous TV shows like "FOX Sports" and on TV networks such as Telemundo and TV Azteca. Ms. Canas continues to build an impressive profile and is constantly in demand between Miami, FL, New York, NY, and Los Angeles, CA. Ms. Canas has over 501 thousand Instagram followers, 7,125 followers on Twitter, and over 9 thousand Facebook likes.

112. That we know of, Canas is depicted in the photos in Exhibit "W" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Canas was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

113. Canas has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no

remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

114. Rhian Sugden is, and at all times relevant to this action was, is an English glamor model, actress, host and spokeswoman who is one of Europe's most famous celebrities. Ms. Sugden has appeared in hundreds of magazines and is one of the most featured Page 3 girls of all time. Ms. Sugden was featured as a Page 3 girl as recently as December 2017. That made a tally for 2017 of five features. Ms. Sugden has been featured in a number of films and was a star competitor in Celebrity Big Brother. Ms. Sugden has an official subscription based website and has marketed her own products including a calendar for many years.

<https://onlyfans.com/rhianmarie> Ms. Sugden has been involved in a number of charities and is often a spokeswoman for the prevention of animal cruelty. Ms. Sugden has over 1 million Social Media Followers.

115. That we know of, Sugden is depicted in the photo in Exhibit "X" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Sugden was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

116. Sugden has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

117. Shelby Chesnes is an American model, actress and businesswoman. Ms. Chesnes started modeling very young and has appeared in many magazines, catalogs and TV commercials. Ms. Chesnes worked for Playboy and became Playboy's Miss July. Ms. Chesney

studied psychology at Florida Atlantic University and owned her own spray tan business. Ms. Chesnes has over 1.2 million followers on Facebook, over 341 thousand on Instagram, over 125 thousand on Twitter and her own e commerce web page.

118. That we know of, Chesnes is depicted in the photo in Exhibit "Y" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Chesnes was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

119. Chesnes has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

120. Tiffany Toth Gray is an extremely successful model that takes great pride in holding the prestigious title of a Playboy Playmate. Ms. Toth was the Playboy "Cyber Girl of the Month" for May 2006. She then went on to pose for three pictorials under Playboy's Fresh Faces. Moreover, she has not only been featured in such magazines as Super Street Bike, Import Tuner, Sport Truck, Iron Man, Seventeen, and Maxim, but has also posed for various catalogs. Ms. Toth has over 3.8 million Facebook followers, over 1.3 million Instagram followers, and 261,516 Twitter followers.

121. That we know of, Gray is depicted in the photos in Exhibit "Z" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Gray was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

122. Gray has never been employed at Wonderland, has never been hired to endorse

Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

123. Tiffany Selby has appeared in TV in shows such as The Girl's Next Door, Bikini Destinations, Poor Man's Bikini Beach (host), Last Comic Standing (model), Deal or No Deal (case model). She has done commercials for Guitar Hero 5 (with Hugh Hefner), Ab Lounge Informercial, and Reflections Boutique. Her modeling consists of Miss Cobra Seats (2010), Dreamgirl Lingerie Catalog (2009), Matco Tools Calendar (2009), Nom De Plum Lingerie Catalog (2008), Watercraft World Magazine (2008), SBT Spokesmodel (2007/08), Playboy Playmate (July 2007), Blue Tattoo Jeans (2008), Players Only . com, Hankook Tires, MHT Wheels, Spike TV . com, Elegant Moments Lingerie Catalog (2008), Quad Magazine (2007), Kat Man Du Poster, Georgia Peach Buns 2005 Calendar/Website, Star Magazine, Miss Hawaiian Tropic (St. Augustine, FL 2002), Miss Hawaiian Tropic (Jacksonville, FL 2004), Axis Magazine, Reflections Boutique, Xposed Magazine, DC Swimwear, Forplay Lingerie 2005 Catalog, Show Me/s Restaurant Billboard, PhatMuscle, RamTech 2005 Calendar, California Surfer Girls 2006 Calendar, Bang Vodka, Joe Rocket, Flirt Catalog, Benchwarmer Trading Cards, Makes & Models Magazine (2006), 2 Wheel Tuner Magazine, Boating Magazine – cover, MPH Magazine (Feb. 2006) Paradise Denim Catalog (2006). G Collections Lingerie Catalog (2006), and Echo Surf Posters. She's been a spokesmodel for Bang Vodka, V-Sept PowerSports, Thompson Pump, Miss Suzuki 2007, and Budweiser 2007. Her promotional work consists of Skoal Promotion, Stacker 2 Promotion, Hawaiian Tropic Promotion, and Guitar Center Grand Opening.

124. That we know of, Selby is depicted in the photos in Exhibit "AA" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that

Selby was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

125. Selby has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

126. Ursula Mayes a/k/a Ursula Sanchez is a model whose career started when her photos won first place in prestigious photography awards and a spread in Maxim magazine. She is well known as a "suitcase model #5" from the hit game show Deal or No Deal. Ms. Mayes has appeared on Minute To Win It, The Tonight Show, and The Jay Leno Show. She has also appeared in campaigns for Coronet Diamonds, Volkswagen, Subaru, Bacardi, Vogue, Elle, In Style, Cosmopolitan, and Marie Claire, to name a few. Ms. Mayes is currently a cover model and a star of the game Juiced 2: Hot Import Nights. She has a modeling contract under CESD Talent Agency (Los Angeles, California) as well as Brand Model & Talent Agency (Orange County, California), and as an actress with Abstract Talent Agency.

127. That we know of, Mayes is depicted in the photos in Exhibit "BB" to promote Wonderland on its Instagram page. This Image was intentionally altered to make it appear that Mayes was either a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

128. Mayes has never been employed at Wonderland, has never been hired to endorse Wonderland, has never been otherwise associated or affiliated with Wonderland, has received no remuneration for Defendants' unauthorized use of her Image, and has suffered, and will continue to suffer, damages as a result of same.

Defendants' Business

129. Upon information and belief, Defendants operated, during the relevant time period, Wonderland, where they engaged in the business of selling alcohol and food in an atmosphere where nude and/or semi-nude women entertain the business' clientele.

130. Upon information and belief, and in furtherance of its promotion their promotion of Wonderland, Defendants own, operate and control Wonderland's social media accounts, including its Facebook, Twitter, and Instagram accounts.

131. Defendants used Wonderland's Facebook, Twitter, and Instagram accounts to promote Wonderland, and to attract patrons thereto.

132. Defendants did this for their own commercial and financial benefit.

133. Defendants have used, advertised, created, printed and distributed the Images of Plaintiffs, as further described and identified above, in order to create the false impression with potential clientele that each Plaintiff either worked as a stripper working at Wonderland, that she endorsed the Club, or that she was otherwise associated or affiliated with the Club.

134. Defendants used Plaintiffs' Images and created the false impression that they worked at or endorsed Wonderland to receive certain benefits therefrom, including but not limited to: monetary payments; increased promotional, advertising, marketing, and other public relations benefits; notoriety; publicity; as well as an increase in business revenue, profits, proceeds, and income.

135. As Defendants were at all times aware, at no point have any of the above-named Plaintiffs ever been affiliated with or employed by Wonderland and at no point have any of the Plaintiffs ever endorsed Wonderland, or otherwise been affiliated or associated with Wonderland.

136. All of Defendants' activities, including their misappropriation of Plaintiffs' Images, and publication of same, were done without the knowledge or consent of Plaintiffs, and Defendants did not compensate Plaintiffs for their use of their Images.

137. As such, Plaintiffs have never received any benefit from Defendants' use of their Images.

Standard Business Practices in the Modeling Industry

138. It is common knowledge in the modeling industry that the hiring of a model for a commercial purpose involves a particularized methodology and process.

139. The fee that a professional model, such as each of the Plaintiffs, will receive is negotiated by her agency, and involves consideration of, without limitation, at least the following factors: a) the reputation, earning capacity, experience, and demand of that particular model; b) the location where the photo shoot takes place, and the length thereof; c) where and how the images are going to be used by the client (*e.g.*, company website, social media, television commercials, billboards or posters), known as "usage"; and, d) the length of time (known as the "term") the rights to use the photos will be assigned. Most licenses to use a model's image are for 1, 2, or 3-year terms; but almost never is there a "lifetime" term.

Defendants' Misappropriation of Plaintiffs' Images

140. As detailed above, Defendants knowingly, and without the prior consent of any of the Plaintiffs, invaded Plaintiffs' privacy by using Plaintiffs' Images for commercial purposes in order to promote Wonderland by and through various marketing and promotional mediums including, without limitation, Wonderland's website, Twitter, Facebook, and Instagram.

141. Defendants showcased Plaintiffs' Images on Wonderland's social media pages to create the false impression that Plaintiffs worked at Wonderland, endorsed, promoted or

sponsored same, or were otherwise associated or affiliated with same.

142. Defendants did so to attract clientele to Wonderland, promote Wonderland, and thereby generate revenue for Defendants.

143. Defendants were aware that, by using Plaintiffs' Images, they were violating Plaintiffs' right to privacy, Plaintiffs' right of publicity, and creating a false impression to potential customers that Plaintiffs worked at and/or endorsed Wonderland.

144. Unauthorized use of Plaintiffs' Images deprives them of income they are owed relating to the commercialization of their Images.

145. In addition, Plaintiffs allege that any improper or unauthorized use of their Images substantially injures their careers.

146. This is especially so insofar as each of Plaintiffs' Images have been associated with a strip club, and the implication of Defendants' use of Plaintiffs' Images is that they are strippers, endorse a strip club, or are otherwise associated or affiliated with a strip club.

147. At no point were any of the Plaintiffs ever affiliated with Wonderland, or Defendants.

148. Each of Plaintiffs' Images was used without her consent.

149. At no point was any Plaintiff ever contacted by any Defendant, or any representative of any of the Defendants, to request the use of any of Plaintiffs' Images.

150. No Defendant ever obtained, either directly or indirectly, permission to use any of Plaintiffs' Images.

151. No Defendant ever paid any Plaintiff for its use of her Images on any promotional materials, including Wonderland website, Twitter, Facebook, or Instagram accounts.

152. Defendants used Plaintiffs' Images without their consent, and without providing

remuneration, in order to permanently deprive each of the Plaintiffs of her right to use her Images.

153. Upon information and belief, Defendants have taken the foregoing actions with the intent of causing irreparable harm to each of the Plaintiffs.

FIRST CAUSE OF ACTION
(Violation of §43 of the Lanham Act, 15 U.S.C. §1125(a)(1)(B): False Advertising)

154. Plaintiffs hereby repeat and reallege each and every allegation set forth in the preceding paragraphs as if fully set forth hereon.

155. The provisions of the Lanham Act, 215 U.S.C. §1125, *et seq.* apply to Defendants, and protect Plaintiffs from the conduct described hereon.

156. As set forth hereon, each advertisement at issue in this action were false and misleading because no Plaintiff ever worked at Wonderland, or agreed to appear in Wonderland's advertisements.

157. Given the false and misleading nature of the advertisements, they had the capacity to deceive consumers and, upon information and belief, did so deceive consumers.

158. Upon information and belief, said deceptive advertisements had a material effect on the purchasing decisions of consumers who attended Wonderland.

159. Insofar as Defendants' published these false and misleading advertisements on the internet, they had the capacity to affect interstate commerce, and, upon information and belief, did so affect interstate commerce.

160. Despite the fact that Defendants were at all times aware that the Plaintiffs neither worked at, nor endorsed the Club, Defendants nevertheless used Plaintiffs Images in order to mislead potential customers as to Plaintiffs' employment at and/or affiliation with the Club.

161. Defendants knew that their use of Plaintiffs' Images would cause consumer

confusion as to Plaintiffs' sponsorship and/or employment at the Club.

162. Upon information and belief, Defendants use of Plaintiffs' Images did in fact cause consumer confusion as to Plaintiffs' employment at and/or endorsement of the Club, and the goods and services provided by the Club.

163. Due to Defendants unauthorized use of Plaintiffs' Images in order to create a false advertisement prohibited by section 43 of the Lanham Act, Plaintiffs have been damaged in an amount to be determined at trial and are likewise entitled to punitive and exemplary damages.

SECOND CAUSE OF ACTION
(Violation of §43 of the Lanham Act, 15 U.S.C. §1125(a)(1)(A): False Association)

164. Plaintiffs hereby repeat and reallege each and every allegation set forth in the preceding paragraphs as if fully set forth hereon.

165. The provisions of the Lanham Act, 215 U.S.C. §1125, *et seq.* apply to Defendants, and protect Plaintiffs from the conduct described hereon.

166. Defendants used Plaintiffs Images in order, *inter alia*, to create the false impression with the public that Plaintiffs were affiliated, connected, or associated with Wonderland, or worked at, sponsored, or approved of Wonderland's goods, services or commercial activities.

167. This was done to promote and attract clientele to Wonderland, and thereby generate revenue for the Defendants.

168. Thus, this was done in furtherance of Defendants' commercial benefit.

169. Despite the fact that Defendants were at all times aware that the Plaintiffs were neither affiliated, connected or associated with Wonderland, nor worked at, sponsored, or approved of Wonderland's goods, services or commercial activities, Defendants nevertheless used Plaintiffs' Images in order to mislead potential customers as to Plaintiffs' employment at

and/or affiliation with Wonderland.

170. Defendants knew that their use of Plaintiffs' Images would cause consumer confusion as to Plaintiffs' sponsorship, affiliation, connection, association and/or employment at the Club.

171. Upon information and belief, Defendants use of Plaintiffs' Images did in fact cause consumer confusion as to Plaintiffs' employment at and/or endorsement of the Club, and the goods and services provided by the Club.

172. Due to Defendants unauthorized use of Plaintiffs' Images in order to create a false endorsement prohibited by section 43 of the Lanham Act, Plaintiffs have been damaged in an amount to be determined at trial and are likewise entitled to punitive and exemplary damages.

THIRD CAUSE OF ACTION
(Rhode Island Gen. Law § 9-1-28.1 - Right to Privacy)

173. Plaintiffs hereby repeat and reallege each and every allegation set forth in the preceding paragraphs as if fully set forth hereon.

174. As set forth hereon, each Plaintiff has and had at the time of Defendants' misappropriation a commercial interest in her image, photo, persona and likeness.

175. Each Plaintiff has a right to not have her likeness appropriated for any purpose without her express consent.

176. Each Plaintiff likewise has a right to be secure from publicity that reasonably places her in a false light before the public;

177. Each Plaintiff likewise has a right to be free from publication of a false or fictitious fact which implies an association which does not exist;

178. As set forth herein, Defendants used each Plaintiff's image and likeness for commercial purposes by using same in Wonderland advertising.

179. Defendants did so without any Plaintiff's consent, written or otherwise.

180. An association with a strip club like Wonderland would be objectionable to the ordinary reasonable person.

181. Plaintiffs are further informed and believe and hereon allege that discovery will prove that Defendants' republicized each Plaintiff's image and likeness on various occasions, via different mediums, after the initial date of the posting of their image and likeness and through the filing of this complaint.

182. Plaintiffs are informed and believe and hereon allege that Defendants' republication of Plaintiff's image and likeness was altered so as to reach a new audience and/or promote a different product for the benefit of the Defendants.

183. Defendants were at all relevant times aware that they never received any Plaintiffs' permission or consent to use their Images on any website or social media account, or on any other medium, in order to promote the Club.

184. At no point did Defendants ever compensate Plaintiffs for its use of their Images.

185. No applicable privilege or authorization exists for Defendants' use of Plaintiffs' Images.

186. In addition to the actual damages suffered by Plaintiffs based on Defendants' violation of this statute, Plaintiffs are entitled to the reasonable attorneys' fees incurred prosecuting this action.

FOURTH CAUSE OF ACTION
(Common Law Right of Publicity)

187. Plaintiffs hereby repeat and reallege each and every allegation set forth in the preceding paragraphs as if fully set forth hereon.

188. As set forth hereon, each Plaintiff has and had at the time of Defendants'

misappropriation a commercial interest in her image, photo, persona and likeness.

189. Said commercial interest was developed by each Plaintiff through her investment of time, effort and money in her career, image, persona and likeness.

190. As set forth herein, Defendants used each Plaintiff's image and likeness for commercial purposes by using same in Wonderland's advertising.

191. Defendants did so without any Plaintiff's consent, written or otherwise.

192. Plaintiffs are further informed and believe and hereon allege that discovery will prove that Defendants' republicized each Plaintiff's image and likeness on various occasions, via different mediums, after the initial date of the posting of their image and likeness and through the filing of this complaint.

193. Plaintiffs are informed and believe and hereon allege that Defendants' republication of each Plaintiff's image and likeness was altered so as to reach a new audience and/or promote a different product.

194. Defendants were at all relevant times aware that they never received any Plaintiffs' permission or consent to use their Images on any website or social media account, or on any other medium, in order to promote the Club.

195. At no point did Defendants ever compensate Plaintiffs for its use of their Images.

196. No applicable privilege or authorization exists for Defendants' use of Plaintiffs' Images.

197. In addition, because Defendants' actions in misappropriating Plaintiffs' images and violating their common law right of publicity was willful and outrageous, Plaintiffs are entitled to punitive damages in an amount to be determined at trial.

FIFTH CAUSE OF ACTION

(Rhode Island Gen. Law § 9-1-28 - Unauthorized use of name, portrait, or picture)

198. Plaintiffs hereby repeat and reallege each and every allegation set forth in the preceding paragraphs as if fully set forth hereon.

199. As set forth hereon, each Plaintiff has and had at the time of Defendants' misappropriation a commercial interest in her image, photo, persona and likeness.

200. Each Plaintiff has a right to not have her likeness appropriated for any purpose without her express consent.

201. Each Plaintiff likewise has a right to be secure from publicity that reasonably places her in a false light before the public;

202. Each Plaintiff likewise has a right to be free from publication of a false or fictitious fact which implies an association which does not exist;

203. As set forth herein, Defendants used each Plaintiff's image and likeness for commercial purposes by using same in Wonderland advertising.

204. Defendants did so without any Plaintiff's consent, written or otherwise.

205. Plaintiffs are further informed and believe and hereon allege that discovery will prove that Defendants' republicized each Plaintiff's image and likeness on various occasions, via different mediums, after the initial date of the posting of their image and likeness and through the filing of this complaint.

206. Plaintiffs are informed and believe and hereon allege that Defendants' republication of each Plaintiff's image and likeness was altered so as to reach a new audience and/or promote a different product.

207. Defendants were at all relevant times aware that they never received any Plaintiffs' permission or consent to use their Images on any website or social media account, or

on any other medium, in order to promote the Club.

208. At no point did Defendants ever compensate Plaintiffs for its use of their Images.

209. No applicable privilege or authorization exists for Defendants' use of Plaintiffs' Images.

210. In addition to the actual damages suffered by Plaintiffs based on Defendants' violation of this statute, said damages should be trebled based on Defendants' knowing and willful conduct as described herein.

SIXTH CAUSE OF ACTION
(Defamation)

211. Plaintiffs hereby repeat and reallege each and every allegation set forth in the preceding paragraphs as if fully set forth hereon.

212. As detailed throughout this Complaint, Defendants have published altered Images of Plaintiffs in order to promote their Club to the general public and potential clientele.

213. Defendants' publication of said Images constitutes a representation that Plaintiffs was either employed by the Club, that they endorsed the Club, or that they had some affiliation with the Club.

214. None of these representations were true.

215. In publishing Plaintiffs' altered Images, it was Defendants' intention to create a false impression to the general public that Plaintiffs were strippers working at the Club, or endorsed the Club.

216. Defendants were at least negligent in publishing Plaintiffs' Images because they knew, or should have known, that Plaintiffs were not employed by the Club, had no affiliation with the Club, had not consented to the use of their Images, and had not been compensated for

the use of their Images.

217. In the alternative, Defendants published the Images of Plaintiffs with actual malice because they knew that Plaintiffs were not employed by the Club, had no affiliation with the Club, had not consented to the use of their Images, and had not been compensated for the use of their Images.

218. Despite Defendants' knowledge and awareness of these facts, they nevertheless made the decision to publish Plaintiffs' Images to attract clientele and generate revenue for themselves.

219. Defendants' publication of Plaintiffs' Images constitutes defamation under Rhode Island law because said publication falsely accuses each Plaintiff of having acted in a manner – *i.e.*, working as a stripper and/or endorsing a strip club - which would subject each Plaintiff to hatred, shame, obloquy, contumely, odium, contempt, ridicule, aversion, ostracism, degradation, or disgrace, and/or could induce an evil opinion of Plaintiffs in the minds of right-thinking persons, and/or could deprive each Plaintiff of confidence and friendly intercourse in society.

220. Defendants' publication of Plaintiffs' Images likewise constitutes defamation *per se* under Rhode Island law because said publication would tend to injure each Plaintiff in her trade, business, and profession as a professional model.

221. This is because any company or brand that sought to hire any of the Plaintiffs as a company or brand representative would be less likely to do so upon learning that she was a professional stripper and/or promoting as strip club, an inference which Defendants' publication of the Images support.

222. Defendants' publication of Plaintiffs' Images likewise constitutes defamation *per se* under Rhode Island law because, insofar as said publication falsely portrays each of the

Plaintiffs as a stripper, it imputes unchastity to her.

223. Defendants' publication of Plaintiffs' Image' caused Plaintiffs to suffer damages in an amount to be determined at trial and are likewise entitled to punitive and exemplary damages.

SEVENTH CAUSE OF ACTION
(Negligence and *Respondeat Superior*)

224. Plaintiffs hereby repeat and reallege each and every allegation set forth in the preceding paragraphs as if fully set forth hereon.

225. Plaintiffs are further informed and believe and hereon allege that Defendants maintain or should have maintained employee policies and procedures which govern the use of intellectual property, publicity rights, and/or the image and likeness of individuals for promotional and advertising purposes which specifically prevent the *unauthorized and non-consensual* use of intellectual property, publicity rights and/or the image and likeness of individuals for promotional and advertising purposes.

226. Further, Defendants should have maintained, or failed to maintain, policies and procedures to ensure that their promotional and/or advertising materials and campaigns were not deceptive or misleading in their advertising practices.

227. Defendants owed a duty of care to Plaintiffs to ensure that their advertising and promotional materials and practices did not infringe on their property and publicity rights.

228. Defendants further owed a duty of care to consumers at large to ensure that their promotional and/or advertising materials and campaigns were not deceptive or misleading in their advertising practices.

229. Defendants breached their duty of care to both Plaintiffs and consumers by failing to either adhere to or implement policies and procedures to ensure that the use of intellectual

property, publicity rights, and/or the image and likeness of individuals for promotional and advertising purposes were not unauthorized, non-consensual, or false and deceptive.

230. Defendants further failed to enforce or implement the above-stated policies and/or to communicate them to employees, and/or supervise its employees in order to ensure that these policies, along with Federal and Rhode Island law, were not violated. Defendants breached their duty of care to Plaintiffs and consumers by its negligent hiring, screening, retaining, supervising, and/or training of its employees and agents.

231. Defendant's breach was the proximate cause of the harm Plaintiffs suffered when their Images were published without their consent, authorization, and done so in a false, misleading and/or deceptive manner.

232. As a result of Defendants' negligence, Plaintiffs have suffered damages in an amount to be determined at trial.

EIGHTH CAUSE OF ACTION
(Conversion)

233. Plaintiffs hereby repeat and reallege each and every allegation set forth in the preceding paragraphs as if fully set forth hereon.

234. Each Plaintiff is, and at all relevant times were, the exclusive owners of all right, title and interest in their Images, and have property interests thereon.

235. By the conduct detailed above, Defendants converted Plaintiffs' property rights in their Images for their own use and financial gain Images for its own use and financial gain.

236. As a result of Defendants' unlawful conversion of Plaintiffs' Images, and publication of same, Plaintiffs have suffered damages in an amount to be determined at trial.

NINTH CAUSE OF ACTION
(Unjust Enrichment)

237. Plaintiffs hereby repeat and reallege each and every allegation set forth in the preceding paragraphs as if fully set forth hereon.

238. As set forth in detail above, Defendants published Plaintiffs' Images in order to promote the Clubs to the general public and potential clientele.

239. Defendants' publication was for the purpose of creating a false impression to the general public that Plaintiffs were either strippers working at the Clubs, or endorsed the Clubs.

240. Defendants' purpose in publishing Plaintiffs' Images was to benefit commercially due to their purported association with, employment of, and/or endorsement by Plaintiffs.

241. Upon information and belief, Defendants did in fact benefit commercially due to their unauthorized use of Plaintiffs' Images.

242. Defendants have been enriched by their unauthorized control over, and publication of, Plaintiffs' Image because said publication has assisted Defendants in attracting clientele to their Clubs.

243. Plaintiffs have not been compensated for Defendants' commercial exploitation of their Images, and thus any financial benefit which Defendants received due to said exploitation is unjust.

244. As such, Plaintiffs have been damaged in an amount to be determined at trial.

TENTH CAUSE OF ACTION
(Quantum Meruit)

245. Plaintiffs hereby repeat and reallege each and every allegation set forth in the preceding paragraphs as if fully set forth hereon.

246. Plaintiffs are each internationally known models who earn their livings appearing

in, *inter alia*, commercials, advertisements, and publications on behalf of companies and brands.

247. Companies and brands that choose to hire Plaintiffs compensate them for their appearances.

248. Although Defendants have availed themselves of the benefit of being associated with Plaintiffs, and making it appear to potential customers that Plaintiffs either work at their Club, endorse their Club, or are otherwise affiliated with their Club, Defendants have not compensated Plaintiffs.

249. Plaintiff is therefore entitled to reasonable compensation for the Clubs' unauthorized use of their Images.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request Judgment in their favor and against Defendants as follows:

- (a) For actual damages, in an amount to be determined at trial, relating to Plaintiffs' first through tenth causes of action;
- (b) For an order permanently enjoining Defendants from using Plaintiffs' Images to promote the Club;
- (c) For punitive and/or treble damages, in an amount to be determined at trial, based on Defendants' willful misappropriation of Plaintiffs' publicity and property rights;
- (d) For all costs and attorneys' fees incurred by Plaintiffs in the prosecution of this Action pursuant to the Lanham Act, 15 U.S.C. § 1117 and Rhode Island's statutory right to privacy; and,
- (e) For such other and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by jury.

PLAINTIFFS,

By their Attorneys,

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**Pro Hac Vice Application Forthcoming*

Dated: September 20, 2019